

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
GREENSBORO DIVISION**

PAUL J. CASTRO,

Plaintiff,

v.

DAVID GOGGINS,

Defendant.

Case No. 1:16-cv-10

PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

NOW COMES the Plaintiff, by and through the undersigned counsel, pursuant to Rule 56 of the Federal Rules of Civil Procedure, and respectfully moves the Court for partial summary judgment in its favor on the Defendant's Counterclaim (Count I: Defamation).

The Plaintiff shows unto the Court that, as to the Defendant's Counterclaim, there is no genuine dispute as to any material fact and the Plaintiff is entitled to judgment as a matter of law. In support thereof, the Plaintiff relies upon the evidence cited, and argument contained, in the Plaintiff's Brief in Support of Motion for Partial Summary Judgment, filed contemporaneously with this motion.

WHEREFORE, the Plaintiff respectfully prays the Court for an Order in its favor of partial summary judgment and for such other relief as the Court deems just and proper.

RESPECTFULLY SUBMITTED, this the 15th day of May, 2017.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this day I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following counsel of record:

Andrew L. Fitzgerald
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THIS THE 15th day of May, 2017.

JERRY MEEK, PLLC

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